

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEPHEN M. WILSON, *et al.*,

Plaintiffs,

-against-

IMAGESAT INTERNATIONAL
N.V.,
et al.,

Defendants.

07 Civ. 6176 (LTS)(DME)

ECF CASE

SUPPLEMENTAL DECLARATION
OF MENASHE BRODER

MENASHE BRODER declares as follows:

1. From January 2002 to June 2005, I served as the Chief Executive Officer of Defendant ImageSat International, N.V. ("ImageSat") and had overall responsibility for ImageSat's business, reporting to the Board of Directors.



2. In 2004, I presided over negotiations with Israel Aerospace Industries Ltd. (formerly Israel Aircraft Industries Ltd.) ("IAI") relating to ImageSat's purchase of the EROS B satellite that was ultimately launched in 2006. I caused ImageSat to order this satellite after having learned that a prior version of the EROS B satellite, which ImageSat had ordered from IAI previously, did not substantially exist.

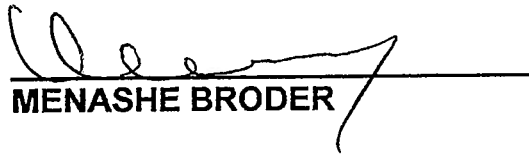
3. During 2004 and 2005, I also initiated discussions with IAI toward the purchase of a Synthetic Aperture Radar (SAR) imaging satellite and the anticipated commercialization of SAR imaging technology then under development at IAI.

4. During the discussions concerning both the EROS B satellite and the SAR satellite, representatives of ImageSat and IAI discussed all aspects of the proposed satellites including their detailed technical specifications, their performance capabilities, budgeting, timelines, customer requirements, and various other types of information relating to the satellites.

A handwritten signature in black ink, consisting of a stylized 'B' followed by a checkmark-like stroke.

5. To the best of my knowledge : (a) no restrictions were placed on the right of ImageSat personnel to participate in the discussions of the EROS B satellite and/or the SAR satellite. and (b) I was never told of any restrictions on our discussing any matters relating to either the EROS satellite or the SAR satellite.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
Executed at Tel Aviv, Israel this 27th day of April, 2008.


MENASHE BRODER